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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

**ST. MATTHEW'S UNIVERSITY
(CAYMAN) LTD., a Cayman Islands
company,**

Plaintiff,

v.

**SABA UNIVERSITY SCHOOL OF
MEDICINE FOUNDATION, a Netherland-
Antilles company; MEDICAL
UNIVERSITY OF THE AMERICAS, a St.
Kitts & Nevis company; EDUCATION
INFORMATION CONSULTANTS, INC., a
Massachusetts corporation;
EDUCATIONAL INTERNATIONAL
CONSULTANTS, LLC, a Massachusetts
limited liability company; PATRICIA L.
HOUGH, M.D. an individual, and d.b.a.
"Saba University School of Medicine";
DAVID L. FREDRICK, an individual;
PANKAJ DESAI, M.D., an individual;
ASSOCIATION OF AMERICAN
INTERNATIONAL MEDICAL
GRADUATES, INC., a Nevada
corporation, a.k.a. "aaimg@yahoo.com";
THOMAS MOORE, M.D. a.k.a.
"presaaimg@hotmail.com" and
"crocdoc2004@netzero.net," an
individual; SARAH B. WEINSTEIN a.k.a.
"execsecaaimg@hotmail.com," an
individual; RACHAEL E. SILVER, an
individual; and DIEDRE MOORE, an
individual,**

Defendants.

Case No. CV-S-05-0848-BES

**PROPOSED ORDER STAYING
PROCEEDINGS**

Quirk & Tratos
Suite 500 North, 3773 Howard Hughes Parkway
Las Vegas, Nevada 89169
(702) 792-3773
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1 Upon consideration of the Joint Motion Requesting a Stay of All Proceedings,
2 this Court enters the following Order:

3 **ORDERED, ADJUDGED AND DECREED**

4 1. The Parties' Joint Motion Requesting a Stay of All Proceedings is
5 hereby granted.

6 2. All matters concerning the present Action as to all Parties shall be
7 stayed for a period of one hundred and twenty (120) days from the Effective Date of
8 this Order (the "Termination Date"). This shall include any motions, discovery or
9 disclosures, mandatory or discretionary conferences, and any dates scheduled, or
10 dates as yet to be scheduled, for any pending motions or petitions.

11 3. This Order shall automatically expire upon the Termination Date,
12 unless extended by further order of the Court upon motion filed by any party.

13 4. Any party may move at any time for an order terminating this stay for
14 good cause shown.

15 5. Nothing in this Order shall be construed or offered as an admission of
16 the existence of any proper claim or defense to a claim, and all claims and rights
17 shall be tolled during the requested stay.

18 6. Nothing in this Order shall be deemed to operate as or effect a waiver
19 of any claims or defenses that any party was entitled to assert or has asserted prior
20 to the entry of this Order, including, without limitation, any and all defenses based on
21 lack of personal jurisdiction.

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1 7. Any and all statutory, common law, rule based, or other deadline that
2 would otherwise occur during the period of the stay are hereby enlarged by the
3 number of days that this case is stayed.

4 **IT IS SO ORDERED.**

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6 DATED: _____, 2006

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9 _____
UNITED STATES DISTRICT JUDGE

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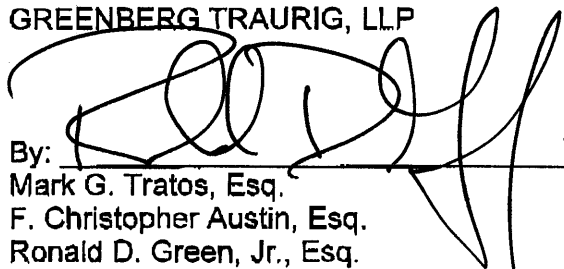
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1 RESPECTFULLY SUBMITTED:

2 Dated: 9/13, 2006

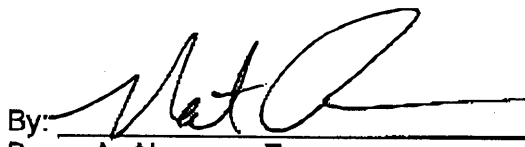
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11 Dated: 9/13, 2006

ALVERSON TAYLOR MORTENSEN & SANDERS

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25 THE AMERICAS, EDUCATION INFORMATION
26 CONSULTANTS, INC., EDUCATIONAL
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